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June 28, 2018

VIA ECF AND EMAIL

The Hon. Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004

Re: *Picard v. Goldenberg*, Case No. 08-01789 (SMB), Adv. Pro. No. 10-04946 (SMB)

Dear Judge Bernstein:

My firm represents defendant Stephen R. Goldenberg in the above-referenced adversary proceeding brought by Trustee Irving H. Picard, arising out of the SIPA liquidation of Bernard L. Madoff Investment Securities LLC. Mr. Goldenberg is preparing to file objections to this Court's June 20, 2018 Report and Recommendation to the District Court to Grant the Plaintiff's Motion for Summary Judgment and Enter Money Judgment in Favor of the Plaintiff in this adversary proceeding.

Under Bankruptcy Rule 9033(b), objections are due by July 5, 2018. Under Rule 9033(c), that time period may be extended by the bankruptcy court for up to 21 days for cause. On behalf of our client, we request the Court extend the time for filing their objections by 15 days – to July 20, 2018. This time is necessary to adequately confer with our client and address the issues raised in the Court's Report and Recommendation.

Counsel for the Trustee and SIPC consent to this request, provided that defendant consents to their request to extend the due date for their responses to August 17, 2018. Our client has no objection to the Trustee's and SIPC's requests for additional time.

Respectfully,

/s/ Matthew A. Kupillas

Matthew A. Kupillas

cc: Nicholas Cremona  
Keith Murphy  
Kevin Bell

*Granted*  
*SMB*  
*7/2/18*